

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Susan Fairchild
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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jose Francisco LUGO-CHIRINOS,

Case No.

Case: 2:25-mj-30218

Assigned To : Unassigned

Assign. Date : 4/10/2025

Description: RE: JOSE FRANCISCO
LUGO-CHIRINOS (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 15, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

Title 18, United States Code, Section 1546(a)

Fraud and Misuse of Visa, Permits and Other Documents

Title 18, United States Code, Section 1028(a)(4)

Possession of Fraudulent Identification Document

This criminal complaint is based on these facts:

On or about March 15, 2025, within the Eastern District of Michigan, Southern Division, Jose Francisco LUGO-CHIRINOS, did knowingly possess a counterfeit Permanent Resident Card ("green card") which contained a A File Number which did not belong to defendant and a counterfeit Social Security Card which included a number that was not assigned to defendant, both of which the defendant knew to be forged, counterfeited, altered and falsely made, and defendant possessed the cards for identification and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a) and Title 18, United States Code, Section 1028(a)(4).

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: April 10, 2025City and state: Detroit, MI


Complainant's signature
Craig Hunter, Deportation Officer
Printed name and title


Judge's signature
David R. Grand, U.S. Magistrate Judge
Printed name and title

Affidavit

I, Craig Hunter being duly sworn, do hereby state:


1. I am a Deportation Officer, with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) Enforcement Removal Operations (ERO). I have been employed by ICE since January of 2022 and have been a Federal Law Enforcement Officer since March of 2012. I am currently assigned as a DO in the Detroit Field Office. I have a total of three years training and experience in the enforcement of the immigration and naturalization laws of the United States. As part of my duties, I am required to identify, locate, apprehend, and remove illegal aliens who are in violation of the Immigration and Nationality Act (INA). I also investigate criminal immigration violations of the United States Code.
2. The information set forth below is for the limited purpose of establishing probable cause. Therefore, this affidavit does not necessarily contain all the information collected during my investigation.
3. Jose Francisco LUGO-CHIRINOS, is a thirty-six-year-old male, native and citizen of Venezuela, who last entered the United States at or near Eagle Pass, Texas, on or about December 19, 2023, without being admitted, inspected or paroled by an Immigration Officer.
4. On December 29, 2023, a Border Patrol Agent encountered LUGO-CHIRINOS in a Texas Border Patrol Sector. The Border Patrol Agent determined that LUGO-CHIRINOS had unlawfully entered the United States from Mexico, at a time and place other than as designated by the Secretary of the Department of Homeland Security of the United States. The U.S. Border Patrol processed LUGO-CHIRINOS as a Warrant of Arrest/Notice To Appear and released him into the United States. LUGO-CHIRINOS currently has an immigration hearing in the Detroit EOIR on September 29, 2025.
5. On March 15, 2025, while conducting surveillance the ICE ERO Officers with the ATD Targeting Team, along with Detroit HSI Agents, observed a male subject matching the description of LUGO-CHIRINOS enter a vehicle behind LUGO-CHIRINOS' known address. One other individual also entered the vehicle. The vehicle left the address, and a vehicle stop was conducted on the LUGO-CHIRINOS vehicle at or near 63XX Sparta St.,

Detroit, MI. ICE ERO Officers approached the vehicle, identified themselves, and made contact with the driver, later confirmed and identified as Jose Francisco LUGO-CHIRINOS. LUGO-CHIRINOS freely claimed to have a court date in immigration court after being encountered by immigration officials in Detroit, MI. LUGO-CHIRINOS also admitted to entering the United States illegally in 2023 near Eagle Pass, Texas without inspection or admission by U.S. immigration officials. LUGO-CHIRINOS never reported to an ICE office in the United States as instructed pursuant to his release conditions. ICE ERO Officers placed LUGO-CHIRINOS under arrest and transported him to the Detroit ICE ERO Field Office for further processing.

6. On March 15, 2025, during processing following the arrest by ICE ERO, officers discovered a fraudulent U.S. Permanent Resident Card, and a fraudulent U.S. Social Security Card in LUGO-CHIRINOS' wallet. The fraudulent Permanent Resident Card bears the full name of LUGO-CHIRINOS, USCIS #XXX-485-224, and his photo. The fraudulent U.S. Social Security Card bears the full name of LUGO-CHIRINOS with SS# XXX-48-3225. Both fraudulent identifications were seized by ICE ERO.
7. During his interview with Deportation Officers, LUGO-CHIRINOS admitted to purchasing the U.S Social Security card and the U.S. Permanent Resident Card at a shelter in Chicago for the amount of \$200.
8. On March 14, 2025, the Department of Homeland Security's (DHS) Central Index System (CIS), which is maintained by the United States Citizenship & Immigration Services (USCIS) and contains biographical information on A numbers, was queried and revealed that A number AXXX 485 224, which appears on the Permanent Resident Card, is not issued to LUGO-CHIRINOS.
9. On March 31, 2025, the Social Security Number was verified through Social Security Administration's Office of Inspector General which revealed that SSN XXX-48-3225 is a validly issued SSN but is not assigned to Jos Francisco LUGO-CHIRINOS.
10. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien

present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.

11. Based upon the above information, probable cause exists to believe that LUGO-CHIRINOS did possess a counterfeit alien registration receipt card in violation of Title 18 United States Code Section 1546(a) and also did knowingly possess a fraudulent social security card with the intent that it be used to defraud the United States, in violation of 18 U.S.C. §1028(a)(4).



Craig Hunter, Deportation Officer
United States Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and signed in my
presence and/or by reliable electronic means.



David R. Grand
United States Magistrate Judge

April 10, 2025